

From: Matthew Jalandoni <mjalandoni@flannerygeorgalis.com>
Sent: Monday, June 19, 2023 10:14 AM
To: Kloss, William D. Jr.; Ben Reese; Alexander, Elizabeth S.; Kutcher, Matthew; Forderer, Kristine; Saalman, Grace E.; Ridings, Matthew; jepstein@dglaw.com; EJimenez@dglaw.com; MacLeod, Diane; King, Jamar; joan.meyer@thompsonhine.com; Karim.Sabbidine@ThompsonHine.com; Cobb, Tiffany Strelow
Cc: Nathan Coyne; Kat Royal
Subject: RE: [EXTERNAL] Root Inc. et al. v. Silver et al., 23-cv-512 (SDOH) - Silver Defendants' R&Os to Plaintiffs' Discovery Requests
Attachments: (45146289.1).2023-04-26 069 STIPULATED PROTECTIVE ORDER.pdf; Root v. Silver - Protective Order Signature Page MLJ.pdf

Bill—

Our timeline on production is dependent on the Court's decision on the attorney fee motion, so we should have a better idea following that decision.

Additionally, I am attaching my signature page for the Protective Order in this matter. I know that opposing counsel were waiting to receive this before producing the Silver defendants' requested discovery.

Thanks,
Matt

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From: Kloss, William D. Jr. <WDKlossjr@vorys.com>
Sent: Friday, June 16, 2023 11:15 PM
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Subject: RE: [EXTERNAL] Root Inc. et al. v. Silver et al., 23-cv-512 (SDOH) - Silver Defendants' R&Os to Plaintiffs' Discovery Requests

Ben,

In light of the upcoming hearing, please let us know when we can expect to actually receive the documents your clients' responses indicate will be produced.

Bill

Sent with BlackBerry Work
(www.blackberry.com)

From: Ben Reese <breese@flannerygeorgalis.com<mailto:breese@flannerygeorgalis.com>>

Date: Friday, Jun 16, 2023 at 10:51 PM

To: Alexander, Elizabeth S. <esalexander@vorys.com<mailto:esalexander@vorys.com>>, Kloss, William D. Jr.

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Subject: [EXTERNAL] Root Inc. et al. v. Silver et al., 23-cv-512 (SDOH) - Silver Defendants' R&Os to Plaintiffs' Discovery

Requests

CAUTION: External Email

Counsel –

Please find attached the Silver Defendants' responses to Plaintiffs' requests for discovery.

Sincerely,

Ben

—
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